

**Draft Supplemental Environmental Impact Report  
P14-0852 and PUD-105, Johnson Drive Economic Development Zone**

Comments submitted by:

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1. Mitigation Measure 4.D-1c: Will the project applicant(s) fund these improvements in full at the time of project construction? If the city plans on funding these improvements, provide a pro-forma analysis of the costs and benefits to Pleasanton taxpayers for funding the incentives.
2. Mitigation Measure 4.D-1d: Will the project applicant(s) fund these improvements in full at the time of project construction? The removal of wetlands in the Alamo Canal may result in significant delays to obtain necessary permits. Since this mitigation will be under the jurisdiction of Caltrans, how will the city manage this process to ensure timely completion? Will this mitigation measure be constructed prior to construction of the EDZ? If the city plans on funding these improvements, provide a pro-forma analysis of the costs and benefits to Pleasanton taxpayers for funding the incentives.
3. What is the future impact of the proposed WB I-580 to SB I-680 flyover to Mitigation Measure 4.D-1d? Will the mitigations preclude or make more costly the flyover based on the newly constructed bridges?
4. Mitigation Measure 4.D-2: What is the status and timing of these regional improvements? If the regional improvements are not made in the near future after the project is constructed, the impacts will not be mitigated and the community will suffer the traffic impacts until there are.
5. The Pleasanton General Plan Vision Statement stipulates that "Pleasanton is committed to sustainable community principles and will meet the needs of the current generation without compromising the ability of future generations to meet their needs." The General Plan goes on to say "A sustainable city draws from the environment only those resources that are necessary and that can be used or recycled perpetually, or returned to the environment in a form that nature can use to generate more resources. Sustainability includes long-term fiscal health for the City as well as conserving natural resources, reducing energy usage, and emitting fewer air pollutants." The General Plan contains many Goals and Programs related to sustainability, including a sampling below:

**Land Use Element, Goal 1:** Create a land use pattern that promotes resource sustainability and environmental quality.

**Circulation Element, Policy 15:** Reduce the total number of average daily traffic trips throughout the city.

**Air Quality Element, Goal 2:** Promote sustainable development and planning to minimize additional air emissions.

**Air Quality Element, Program 2.1:** Implement programs from the Land Use Element to provide mixed-use developments, locate high-density uses near transit facilities, and provide neighborhood-serving retail uses convenient to residential neighborhoods. These programs would reduce vehicle trips and vehicle miles traveled, thus reducing air-pollutant emissions.

The DSEIR Impact 4.B-3 indicates that the operation of new uses within the proposed EDZ area would conflict, even after mitigation, with or obstruct implementation of the Bay Area 2010 Clean Air Plan, and this impact would be significant and unavoidable.

Given the traffic, air quality, and land use impacts of this project identified in the DSEIR, the EDZ clearly does not meet the standards of Sustainable Development as articulated in the General Plan. Please explain why the DSEIR did not find that the project does not comply with these very important policies to promote Sustainable Development in the City of Pleasanton.

6. Numerous studies have demonstrated the negative economic impacts that big box stores have on local economies and local communities, especially when tax or other incentives are provided to developers and big box store operators. One study that demonstrates this can be found here: <https://ilsr.org/dark-store-tax-tactic-makes-big-box-stores-terrible-deal-for-cities/> . These impacts can cause existing, locally owned retail outlets to go out of business due to loss of sales resulting in damage and “urban decay” to the community from closing stores and vacant or underutilized properties. Business in downtown Pleasanton are especially vulnerable to this effect.

The Fiscal Impact Analysis included in the DSEIR is inadequate. This analysis relies of “rule of thumb” and general factors from like uses to determine revenue that would be provided from the project to the city. A full, comprehensive economic and fiscal analysis, prepared by an independent qualified firm, should be prepared for this project and include, at a minimum, evaluation of the following criteria:

- A complete market forecast of the proposed uses of the EDZ based on project-specific criteria without reliance on “rule of thumb” and general factors
- Full pro-forma analysis of the Big Box, hotel, and other retail/office uses comparing revenue, costs, and profit realized from the project. This should include a pro-forma analysis of developer costs and profit
- A full evaluation of project infrastructure costs, including freeway improvements and how those costs affect the profitability of the proposed project uses if funded by the developer or individual uses.
- A fiscal evaluation of revenue benefits for the city based on the above analysis
- A full evaluation of ay incentives provided by the city for this project including funding of infrastructure improvements or sales and property tax reductions and discounts. This would include an analysis of how these incentives effect city gained revenue from this project over a 30-year span

- The effect that the project would have on sales loss to existing, similar businesses in Pleasanton. This should include downtown and other areas of Pleasanton
  - A forecast of existing business closures and the resulting “urban decay” caused by the EDZ
  - Losses of wages and benefits to workers at existing businesses that are displaced by the new businesses in the EDZ
  - An analysis of profits leaving the community from the new corporate businesses as compared to existing businesses
7. The analysis of the project's compliance with the Pleasanton Climate Action Plan (CAP) is flawed and inadequate. The DSEIR anticipates future, yet to be implemented state policies from AB=32 to allow Pleasanton to meet its GHG emissions reductions targets as outlined in the CAP. Relying on the potential future reductions is speculative at best and cannot be accurately quantified. The DSEIR should evaluate the forecasted GHG emissions from this project against a baseline of the existing zoning as well as the DSEIR project alternatives. This would provide an accurate impact of the project related to achieving the emissions reductions targets of the CAP.